

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JENNIFER COKER,

Plaintiff,

v.

C. R. BARD, INC. and BARD
PERIPHERAL VASCULAR, INC.,

Defendants.

Civil Action No.

1:13-cv-00515-TWT

**PLAINTIFF JENNIFER COKER'S OMNIBUS RESPONSE TO
DEFENDANTS' MOTIONS *IN LIMINE* [DKT NOS. 149 and 151]**

Plaintiff does not oppose the following motions *in limine* without prejudice:

1. Defendants' Motion *in Limine* to Exclude Dr. Garcia's General Expert Opinions that Were Not Disclosed in Bard's IVC Filter MDL [Dkt. 149]; and,
2. Defendants' Motion *in Limine* to Exclude Evidence or Argument that Plaintiff's Experts Drs. Rogers, Moritz, and Stein were originally retained by Bard (Dkt. 151).

While Plaintiff currently does not intend to offer the evidence defendants seek to exclude (as specified, above), Plaintiff reserves the right to revisit these motions should defendants "open the door" to the relevance of this evidence or for other good cause grounds, before or during trial.

DATED this 10th day of May 2022.

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

In accordance with Local Rule 7.1D, this is to certify that this brief has been prepared with one of the fonts and points approved by the Court in LR 5.1B, i.e. 14 point, Times New roman font, and that the brief does not contain more than 10 characters per inch of type.

Dated this 10th day of May, 2022

/s/ Ramon Rossi Lopez

Ramon Rossi Lopez

CERTIFICATE OF SERVICE

I hereby certify that, on this 6th day of May, 2022, I caused to be served through the ECF system a true and legible copy of the foregoing document upon the following attorneys for defendants:

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